Executive Summary
Direct Investigation Operation Report

Transport Department's Arrangements for Driving Tests

Introduction

In recent years, there is a growing public demand for driving tests (especially road tests) and the average waiting time of driving tests is very long. However, the number of road test provided by the Transport Department (TD) is affected by various factors, including the objective conditions of the venues of the test centers, the traffic conditions in the vicinity, the demand for road tests for different types of vehicles, as well as the manpower of the TD, etc., resulting in an insufficient number of driving tests to satisfy the public demand over the years. Furthermore, driving test services had been suspended intermittently by TD six times between 2020 and 2022 in response to the Government’s anti-epidemic and social distancing measures during the COVID-19 outbreak. As a result, the waiting time for taking the more popular driving test for non-commercial vehicles had once been as long as nearly a year.

2. In addition, the number of appeals against road test results also shows a rising trend in recent years, reflecting an increase in the public’s discontent with TD’s road test arrangements. We have also received public complaints and queries about TD’s decision of and justification for prohibiting video recording of road tests with the dashboard cameras in test vehicles.

3. Against this background, we have examined TD’s administrative arrangements for and management of driving test services, its mechanisms for evaluating candidates’ performance in road tests and handling appeals, as well as explored the feasibility for TD to record driving tests more objectively with the help of technology. Based on our findings in the investigation, we have the following observations and comments with respect to TD’s arrangements for driving tests.

Our Findings

(I) PROACTIVELY EXPLORE WAYS TO IMPROVE DRIVING TEST SERVICES AND SHORTEN WAITING TIME FOR ROAD TESTS

Explore Ways to Increase Road Test Output by Putting in More Manpower Resources and Designating New Test Venues

4. During the last 12 years, both the number of applications for road tests and the road test output of TD had increased, but the road test services still failed to meet the demand. Put simply, the waiting time for road tests would remain excessively long unless there is a sustained and substantial decrease in the demand for the tests. In other words, the waiting would only be prolonged again if more and more people apply for the road tests in the future. This Office considers the situation is undesirable. TD should, therefore, make every effort to increase road test output to ensure a shorter waiting time of candidates.

5. We noticed that since the end of the epidemic, TD has arranged for Driving Examiners ("DEs") to work extra hours in a bid to increase road test output, and indicated that it will look for suitable sites to set up new driving test centres. We agree to the above measures and recommend that TD explore how to increase road test output by putting in more manpower resources and designating new test venues. For instance, it can arrange for DEs to take up additional work on weekends so that more road tests can be arranged. Besides, the Department should consider setting up additional driving test centres at locations with lower traffic flows in various parts of Hong Kong (e.g. at locations in the New Territories or outlying islands which are farther away from the city centre or residential areas). If designating new driving test centres proves to be effective in shortening the candidates' waiting time for road tests, TD should, in the long run, consider replacing those driving test centres currently located in busy districts with the newly set up centres, where feasible.

Continue to Review and Enhance the "Duty Reporting Arrangement" to Increase Road Test Output

6. Under the "Duty Reporting Arrangement", DEs must first arrive at the TD Headquarters in Ho Man Tin, Kowloon by 8 am every working day for computer ballot-drawing, then proceed to the various driving test centres to discharge their testing duties. Such arrangement results in extra travel time by the staff involved and would in effect reduce the time available to DEs for conducting road tests each day.

7. We are glad to learn that in response to our investigation, TD had completed another review on the "Duty Reporting Arrangement" at the end of 2023, and has since mid-June this year adopted the "Direct Reporting Arrangement" (DEs should be allowed to travel directly from residence premises to driving test centres assigned by balloting to discharge testing duties) on a trial basis at four of the non-commercial vehicles driving test centres. We recommend that TD review the "Direct Reporting Arrangement" after a certain period into the trial run at the four test centres. If the trial is effective and staff's feedback is positive, TD should proactively study the feasibility of implementing the "Direct Reporting Arrangement" at other driving test centres so as to increase its road test output.

Reinstate the Target Waiting time and Achievement Rates on Conducting Road Tests for Non-Commercial Vehicles

8. Previously, TD had set performance pledge at within 82 days and a 95% achievement target regarding the waiting time for road tests for non-commercial vehicles. This is a demonstration of good public administration. Nevertheless, the Department abolished the performance pledge and no longer projected the achievement rate in 2016 due to changes in supply and demand for the tests. We consider that waiting time is not only a significant statistical indicator, but also an important yardstick with which TD can assess and enhance its operations, optimise its resource deployment and allocation, as well as a criterion for the Department and the public to monitor TD's work efficiency. We recommend that TD resume the practice of setting service standards in respect of road tests for non-commercial vehicles and state clearly the target of arranging a road test for candidate within certain number of days upon receiving an application for the test.

(II) ENHANCE ARRANGEMENTS FOR RECORDING ROAD TEST ASSESSMENTS

Provide Guidelines to DEs on Making Instant Remarks

9. Both TD and the Transport Tribunal have been handling more and more appeal and review cases in recent years. Currently, the handling procedures rely heavily on the instant remarks and records made by the DEs in the course of the road tests. Nevertheless, when we scrutinised the instant records made by various DEs during road tests, we noticed obvious differences in how the DEs had made the records and what

they had written down. We consider it imperative that TD promulgate guidelines on the making of instant remarks by DEs during road tests to enable DEs to record driving road test assessments more efficiently and more accurately by means of standardized criteria.

Installing Video Recording Equipment in Test Vehicles

10. At present, TD prohibits the installation of video recording equipment in test vehicles. As such, appeals and review requests can only be processed based on the reports written by DEs immediately after the road tests. Having examined the administrative arrangements for road tests in the Mainland and other regions, we found that video recording equipment are already being used in the Mainland and some other countries to record the course of road tests and candidates can request to review the recorded footages in order to file appeals. In some countries, electronic systems have already been or are going to be adopted to evaluate road test performance.

11. With the growing popularity of dashboard cameras and the rapid development of reliable technology, installing video recording equipment in test vehicles is in line with the prevailing trend in society, and it actually has certain practical benefits. This Office opines that TD should seriously review its current practice of prohibiting video recording of road tests and consider whether introducing video recording systems or equipment specifically for road tests is adequate and reasonable. This arrangement would facilitate collection of data and video images during the tests by TD and the candidates and make it easier for DEs to explain their professional assessment of candidates' performance, as well as raise the Department's efficiency in handling candidates' appeals and requests for review. We agree that protecting personal privacy is of paramount importance. So, in addition to making video-recording arrangement, TD should also examine ways to properly manage and maintain the personal data contained in the footages. It should communicate with the stakeholders continuously and respond to their different concerns. We are pleased to note that TD has already conducted a feasibility study on the installation of video recording equipment in test vehicles. In the long run, the Department should further consider whether advanced technology (such as electronic assessment systems) should be employed to help DEs evaluate candidates' performance in driving tests.

(III) ENHANCE ARRANGEMENTS RELATING TO DRIVING TESTS

Extend Validity Period of Learner's Driving Licence and Driving Test Form

12. Recent years saw a growing demand for road tests and a lengthening waiting time for taking the tests. Currently, candidates usually have to wait around 7 to 8 months. The waiting had once been as long as about a year during the epidemic. Under such circumstances, it is not pragmatic for TD to set a validity period of 12 and 18 months respectively for the learner's driving licence and the driving test form. Candidates who have failed the road test and are allotted an end-of-list test appointment date for retest would probably have to apply for a learner's driving licence again because the original licence would have expired by then. Similarly, the driving test forms of candidates who have applied for postponing the road test may also have expired before the candidates can actually take the road tests, given the growing demand and the already long waiting time for the tests.

13. We are of the opinion that unless TD can, within a short period, shrink the waiting time for road tests to around 82 days, just as it had been ten years ago, otherwise, with the current long waiting time for the tests, the short validity period of the learner's driving licence and the driving test form would indirectly cost road test candidates more time and money. Besides, TD would also need to spend resources accordingly to handle applications for renewing the learner's driving licence and the driving test form. This would in effect increase its administrative cost. In this light, we recommend that TD review the validity period of the learner's driving licence and the driving test form.

Registration of Test Vehicles

14. Some candidates indicated that despite having arrived at the driving test centres on time, they still could not sit for the road test because their driving instructors, together with the test vehicles, failed to show up for the tests. Since private driving instructors can have a number of students simultaneously, they may have to shuttle between different driving test centres within a short period of time on the same day so that their students can use the vehicle for the driving tests scheduled for the day. At present, TD only requires the candidates to provide the registration numbers of the test vehicles and information about the driving instructors when they attend the road test. If the same test vehicle is found to have been registered for several road tests to be held at the same test session, only the first candidate who registers the vehicle would be allowed to sit for the test. The other candidates whose tests are scheduled for a later time would have to look for another eligible vehicle on the spot at once.

15. When candidates fail to sit for road tests because their test vehicles are engaged in road tests held elsewhere at a similar time and cannot arrive at the test centres, it would not only affect the candidates (who would have to queue up for the road test again as a result), it would also waste the precious test sessions. We consider that the above situation can be avoided with administrative measures, such that test resources can be better utilised, different candidates would not register the same test vehicle for road tests scheduled for the same time slot, and those candidates given a later test slot would not miss the road test for not having a test vehicle, thereby wasting the test sessions.

<u>“Venue Assistants” near Driving Test Centres</u>

16. With respect to the “venue assistants” hired by the different Driving Instructors Associations, TD considered that they have not affected the road tests process and the Department has communicated with the relevant sector regarding the issue. Our observations found that the “venue assistants” had in fact rendered the candidates a lot of help in the course of the road tests. As TD confirmed that it had received complaints about some assistants asking for money at test venues, we consider that it should step up venue management at driving test centres and keep communicating with the driving instructor sector to help monitor the operations of “venue assistants” so as to ensure that the road tests are conducted in a fair and orderly manner.

Our Recommendations

17. In light of the comments above, The Ombudsman has the following recommendations to TD:

(1) to proactively explore ways to further increase road test output through flexible manpower deployment. For instance, it can consider arranging for the DEs to work extra hours on Weekends;

(2) to study proactively the feasibility of increasing road test output by designating more driving test centres at locations with lower traffic flows in various parts of Hong Kong (e.g. at locations farther away from the city centre or residential areas);

(3) to conscientiously review the trial run of the “Direct Reporting Arrangement” at the four driving test centres;

(4) if the above trial arrangement is positively received, TD should proactively examine the possibility of extending the Arrangement to other driving test centres;

(5) to resume the practice of setting service standards and achievement targets in terms of waiting time for road tests for non-commercial vehicles;

(6) to promulgate guidelines as soon as possible on the making of instant remarks by DEs during road tests;

(7) to review its practice of prohibiting video recording of road tests;

(8) if video recording is feasible upon review, TD should examine measures to protect personal privacy and communicate with the stakeholders continuously in the course of introducing video recording equipment specifically for road tests;

(9) in the long run, to consider whether advanced technology (such as electronic assessment systems) should be employed to help DEs evaluate candidates’ performance in driving tests;

(10) to seriously review the validity periods of the learner’s driving licence and driving test form;

(11) to implement suitable measures as soon as possible to prevent the situation where more than one candidate registers the same test vehicle for their road tests during the same time slot because the private driving instructor has to provide his/her vehicle for use by several candidates under a tight road test schedule; and

(12) step up management at driving test centres and keep in constant communication with the driving instructor sector with respect to the monitoring the operations of their staff so as to ensure that road tests are conducted in a fair and orderly manner.

Office of The Ombudsman
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